

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA,)	
)	
v.)	Civil No. 1:21-CV-03847-TWT
)	
\$8,500 IN U.S. CURRENCY,)	
)	
Defendant,)	
)	
BRIAN MOORE, JR.,)	
)	
Claimant.)	

**CLAIMANT’S RESPONSE TO OPPOSITION TO
MOTION TO EXTEND DISCOVERY**

Claimant, BRIAN MOORE, JR. (hereinafter “Claimant” or “Mr. Moore”),
by and through his undersigned attorney, hereby files this Response to Opposition
to Motion to Extend Discovery, and states as follows:

1. Claimant opposes the Motion to Extend Discovery as this case is almost
one year old. In fact, the seizure in this case occurred over 16 months ago
on March 26, 2021.
2. Claimant previously agreed and stipulated to an extension of discovery
up to and including August 3, 2022.
3. Plaintiff has been in possession of information regarding witness
Jacqueline Butler since the time the money was seized in March of 2021.
Indeed, Claimant’s grandmother and her involvement with the bank

account that Claimant withdrew the money at issue from is discussed in the initial documents provided by the Government and produced from the federal agents involved.

4. In addition, Plaintiff was in possession of Claimant's discovery responses discussing Ms. Butler at the end of April 2022. Plaintiff's counsel did not contact Claimant's counsel any time to discuss scheduling a deposition for Ms. Butler. Counsel's first discussion mentioning a deposition for Ms. Butler was when the parties discussed the present motion on or about July 27, 2022.
5. Claimant has been charged with no crime by the Government in association with the currency at issue. There is no reliable evidence of any sort that the money at issue is proceeds from or to be used in any criminal endeavor. In addition, Claimant was attempting to travel with less than \$10,000 when his money was taken and he had no obligation to declare that money or receive some sort of permission from any authority to travel with such money. As such, Claimant opposes another four month delay to complete discovery.

WHEREFORE, Claimant respectfully requests that this Court deny Plaintiff's Emergency Motion to Extend Discovery.

Respectfully submitted, this 1st day of August, 2022.

By: /s/ Jason D. Sammis
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I hereby certify that a true and correct copy
of the foregoing was electronically submitted
this 1st day of August 2022, to:

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